

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

FILED
IN CLERKS OFFICE
2004 JAN 12 10 3:07
U.S. DISTRICT COURT
DISTRICT OF MASS.

MAVERICK CONSTRUCTION CORP.

v.

**BUILDING AND CONSTRUCTION TRADES COUNCIL
OF BOSTON; LOCAL 103 INTERNATIONAL
BROTHERHOOD OF ELECTRICAL WORKERS; AND
LOCAL 223, LABORERS' INTERNATIONAL UNION
OF NORTH AMERICA**

Case No. 03cv12537 WGY

**ANSWER
OF LOCAL 223, LABORERS
INTERNATIONAL UNION OF
NORTH AMERICA**

1. Admitted
2. Admitted
3. Local Union 223 is without sufficient knowledge to either or deny the allegations set forth in Court 3, but leave Plaintiff to his proof.
4. Admitted
5. Admitted
6. Admitted
7. Local Union 223 notes that the allegations of Paragraph 7 are legal conclusions. Accordingly, Local 223 leaves the Plaintiff to his proof.
8. Local Union 223 notes that the allegations of Paragraph 8 are legal conclusions. Accordingly, Local 223 leaves the Plaintiff to his proof.
9. Admitted
10. Admitted

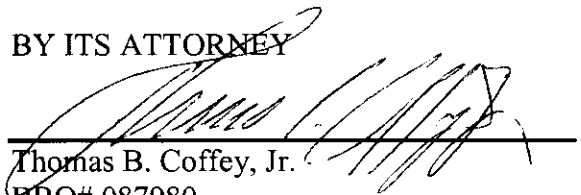
11. Admitted
12. Local 223 neither admits nor denies the allegations of Paragraph 12. Accordingly, Local 223 leaves the Plaintiff to his proof.
13. Admitted
14. Denied
15. Denied. This was not the intended result of any action by Local 223.
16. Denied. No members of Local 223 were so employed.
17. Local 223 relies upon, and incorporates herein, its responses to Paragraphs 1-16 above.
18. Denied. No members of Local 223 were so employed.
19. Denied
20. Local 223 is without sufficient knowledge to either admit or deny the allegation of Paragraph 20. Accordingly, Local 223 leaves the Plaintiff to his proof.

WHEREAS, Local 223 of the Laborers' International Union of North America prays for the following relief:

- A. That this Court deny and dismiss the Complaint against it; and
- B. That this Court award Local 223 the attorney fees and costs associated with the defense of this action.

RESPECTFULLY SUBMITTED:
LOCAL UNION 223 OF THE
LABORERS' INTERNATIONAL UNION
OF NORTH AMERICA

BY ITS ATTORNEY

A handwritten signature in black ink, appearing to read "Thomas B. Coffey, Jr.", is written over a horizontal line.

Thomas B. Coffey, Jr.
BBO# 087980
Regional Attorney, Massachusetts Division
7 Laborers' Way
Hopkinton, Massachusetts 01748
(508) 435-4164

Dated: January 9, 2004

CERTIFICATE OF SERVICE

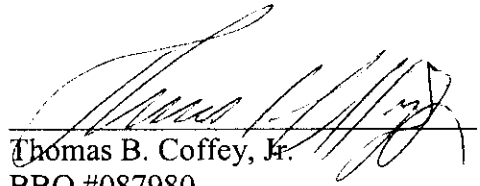
I, Thomas B. Coffey, Jr., do hereby certify that a copy of the attached ANSWER was forwarded by first class mail on January 9, 2004, to the following parties of record:

David S. Rubin, Esq.
Epstein Becker & Green, P.C.
111 Huntington Avenue
Boston, MA 02199

Building and Construction Trades Council of Boston
256 Freeport Street
Boston, MA 02122-3538

Local 103 International
Brotherhood of Electrical Workers
256 Freeport Street
Boston, MA 02122-3538

Dated: January 9, 2004


Thomas B. Coffey, Jr.
BBO #087980